

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

KAY X. YANG, et al,

Defendants.

Case No. 2:22-cv-0450

Hon. J.P. Stadtmueller

PLAINTIFF’S REPLY IN SUPPORT OF ITS MOTION FOR DEFAULT JUDGMENT

On March 13, 2023, Plaintiff United States Securities and Exchange Commission (“SEC”) filed a Motion for Default Judgment against All Defendants, as well as a supporting Memorandum of Law and a supporting Declaration. (*See* Docket Nos. 45, 46, 46-1) The SEC’s filings demonstrate that it is entitled to the relief sought, and prove up the financial remedies requested. *See Dundee Cement Co. v. Howard Pipe & Concrete Prods., Inc.*, 722 F.2d 1319, 1323 (7th Cir. 1983); *Cree, Inc. v. BHP Energy Mexico S. De R.L. De C.V.*, 335 F.Supp.3d 1105, 1111 (E.D. Wis. 2018).

Pursuant to the Court’s order establishing a briefing schedule on the SEC’s motion, Defendants’ response was due by April 3, 2023. (Docket No. 42) As of April 11, 2023, Defendants have not responded to the motion. No responsive filing appears on the docket, and Plaintiff’s counsel have not received any response from Defendants via email, U.S. Mail, or overnight delivery service.

Therefore, the SEC respectfully requests that this Court grant the Motion for Default Judgment against All Defendants, grant all relief requested therein, and grant such other and further relief as this Court deems appropriate.

Dated: April 11, 2023.

By: /s/BeLinda I. Mathie
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U.S. Securities and Exchange Commission
Chicago Regional Office
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*Attorneys for the Plaintiff U.S. Securities
Exchange Commission*

CERTIFICATE OF SERVICE

I certify that on April 11, 2023, I caused a copies of the foregoing Plaintiff's Reply in Support of Its Motion for Default Judgment to be served by email and U.S. Mail delivery, upon:

Kay X. Yang (kayyang@pm.me)
P.O. Box 217
Mequon, WI 53092

and solely by U.S. Mail delivery upon:

Xapphire LLC
P.O. Box 217
Mequon, WI 53092

Chao Yang
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/s/BeLinda I. Mathie

BeLinda I. Mathie